

Ex Parte via Electronic Filing

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Consumer Information and Disclosure, CG Docket No. 09-158; Truth-in-Billing and Billing Format, CC Docket No. 98-170; IP-enabled Services, WC Docket No. 04-36, Broadband Industry Practices, WC Docket No. 07-52.

Dear Ms. Dortch:

On May 16, 2012, representatives from different organizations met for the second convening of the FCC's Next-Generation Measurement Architecture Standardization and Outreach Group (NMASOG).

Attendees were Tom Anschutz of AT&T; Ken Koh of Adtran; Jeb Benedict and Michael Bugenhagen of CenturyLink; Russ Gyurek of Cisco; James Miller, Jose Trevino, and Walter Johnston of the FCC; Meredith Whittaker of Google/M-Lab; David Horne of Intel; Shane Amante of Level 3; Steve Bauer of MIT; Jim Partridge of NCTA; Thomas Gideon of New America Foundation/M-Lab; Ariela Fish, Neil Campell, and Sam Crawford of SamKnows; Jason Weil of Time Warner Cable; and David Young and Kitty O'Hara of Verizon.

The meeting convened to discuss and define the role of this nascent group, and the way in which it can best facilitate the practical implementation of standards being developed in the broadband measurement space.

NMASOG's interaction with official standards bodies was discussed. Mr. Johnston mentioned working with the IETF, through Henning Schulzrinne, FCC CTO, and with the Broadband Forum, through Ken Ko at Adtran. Mr. Johnston suggested an approach in which NMASOG formulated a clear notion of a preferred implementation, and passed this as a catalyst to the IETF and the Broadband Forum. Ms. Whittaker from M-Lab/Google reiterated M-Lab's suggestion, expressed in M-Lab's written comments on the NMASOG Mission document (comments included below), that the group's role be less prescriptive. Ms. Whittaker suggested that the NMASOG group act as the "research" wing of the larger Measuring Broadband America project, working with academics and other expert stakeholders to understand the efficacy of the broad array of current measurement approaches, in order not to preclude the incorporation of advances in the state of the art, or changes in network behavior.

Ms. Whittaker also mentioned IEEE's 802.16 working group, focusing on mobile measurement standards, and suggested that this group's work be considered along with de-facto standards created by academic researchers, which can offer consistent, interoperable ways to measure novel characteristics of broadband performance outside of an official standard.

Representatives from Niksun, suggested that he could give a demonstration of possible passive measurement approaches that could be instantiated in a proposed standard. M-Lab reaffirms the suggestion, put down in their comments on the NMASOG mission document, that the Commission not instantiate a standardized measurement approach that cannot meet a litmus of openness and transparency. Openness, as defined in M-Lab's proposed litmus, acts to ensure credibility, allowing a broad array of experts access to the data and the measurement methodologies, and allowing changes to a given approach to be dictated by the scientific process, in the open, with the benefit of many expert views. A passive

measurement approach would therefore be problematic, given that it would collect data that categorically could not be made publicly available due to privacy concerns. M-Lab cautions against this approach.

Please contact the undersigned if there are any questions about this filing.

Respectfully submitted,
/s/ Meredith Whittaker

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Enclosure

cc: Walter Johnston

The comments submitted by M-Lab in response to the NMASOG Mission document are included below here for the public record.

M-Lab comments on the Next-Generation Measurement Architecture Standardization and Outreach Group (NMASOG)

James,

Thank you for the opportunity to provide feedback on the NMASOG Mission document. Please find our comments below. We offer these comments on behalf of the M-Lab Consortium, for consideration and incorporation in next draft.

- First and foremost, we believe that the NMASOG Mission document must stress the need for openness. The interoperability and compatibility that any given standard provides is a laudable goal. However, any scientifically reputable measurement program must allow for the participation of a broad range of expert stakeholders. This can only happen within a framework of openness and transparency. In order to ensure that the technology used keeps pace with the dynamism and complexity of networks it is crucial that any adopted standard favors openness. Namely, a standard considered for adoption by the commission should meet the following criteria:
 - It should be open itself.
 - It should prescribe open-source testing methodologies, as applicable.
 - It should prescribe openly documented, independently managed architecture.
 - It should favor the collection of “active” measurement data, to ensure that all data collected can be released publicly in its raw form without privacy concerns. We caution against instantiating any standard that relies on passive monitoring or collection of other PII.

We strongly encourage NMASOG to incorporate this preference for open, scientifically vettable methods in its Mission document. We propose these as a litmus, against which possible approaches can be weighed.

- Similarly, M-Lab cautions against a model in which an adopted standard is used to lock in a given approach to measurement, precluding the incorporation of advances in technology and good data collected using parallel approaches. We propose that any scientifically sound approach that passes the “openness test” and can be documented to address a novel area of measurement not already covered by an adopted approach should be considered for parallel inclusion in a robust measurement program, and its data incorporated into the commission's overall picture of network health. We propose that NMASOG address this need for a flexible, inclusive framework in its Mission document.
- As NMASOG is newly formed, it is natural that its role is evolving. We appreciate this, and suggest that in the second draft of the Mission document the specific objectives, and practical roles within the group be more clearly defined. We believe that the group should act as the “research wing” of the current Measuring Broadband America (MBA) effort, inviting a community of experts to discuss and present new work, and to comment on proposed standards under review. We caution that because NMASOG will be in the position of reviewing new and novel approaches to measurement that it should follow a policy of rigorous openness governing its internal operations, inviting comment from a broad array of known experts, and allowing these comments to be incorporated into the public record for review and debate by others. As a consortium representing the network measurement community, M-Lab is happy to offer our help organizing the participation of the research community in this effort.
- Finally, M-Lab strongly suggests that the Mission of the group be decoupled from the Overview of Requirements and Elements, in which current and proposed models employed by the MBA

effort are reviewed. Given that the role of the group is to explore current and future standards and to invite the input of experts in the field, we believe that any considered standard -- including those currently employed -- should be clearly framed as one of many options considered under the larger banner of the NMASOG mission. We suggest breaking the Mission section and the Overview section into two distinct documents, as to avoid conflating the high-level goal of the group with one of the many measurement options it was formed to explore.